

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI**

MISSOURI STATE CONFERENCE OF)	
THE NATIONAL ASSOCIATION FOR)	
THE ADVANCEMENT OF COLORED)	
PEOPLE, ET AL.,)	
)	
Plaintiffs,)	
)	
v.)	No. 4:14-cv-02077-RWS
)	
FERGUSON-FLORISSANT SCHOOL)	
DISTRICT, ET AL.,)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs, the Missouri State Conference of the National Association for the Advancement of Colored People, Redditt Hudson, F. Willis Johnson, and Doris Bailey, respectfully move the Court to grant summary judgment in their favor and against Defendants Ferguson-Florissant School District and St. Louis Board of Election Commissioners. For the reasons explained in Plaintiffs' memorandum in support, summary judgment is appropriate because "there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law" on the claim that, based on the totality of the circumstances, the at-large method for electing Ferguson-Florissant School Board members, in combination with racially polarized voting, denies African-American voters an equal opportunity to elect representatives of their choice, in violation of Section 2 of the Voting Rights Act of 1965, 52 U.S.C. § 10301. Fed. R. Civ. P. 56(a).

WHEREFORE, Plaintiffs request this Court grant summary judgment in favor of Plaintiffs.

Respectfully submitted,

/s/ Julie A. Ebenstein

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CERTIFICATE OF SERVICE

I, Julie A. Ebenstein, hereby certify that on September 30, 2015, I filed the foregoing document using the e-filing system, thereby serving electronic copies via email to all named parties below:

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